



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

July 24, 2009

Mr. Larry Meyer  
Site Vice President  
NextEra Energy Point Beach, LLC  
6610 Nuclear Road  
Two Rivers, WI 54241-9516

SUBJECT: POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2 - REQUEST FOR  
ADDITIONAL INFORMATION FROM CONTAINMENT AND VENTILATION  
BRANCH RE: ALTERNATE SOURCE TERM (TAC NOS. ME0219  
AND ME0220)

Dear Mr. Meyer:

By letter to the U.S. Nuclear Regulatory Commission (NRC) dated December 8, 2008, as supplemented by letters dated January 16 and 27, February 20, two letters on April 17, May 15, and June 1, 2009 (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML083450683, ML090160571, ML090280348, ML090540860, ML091100182, ML091100215, ML091380113, and ML091560413, respectively), FPL Energy Point Beach, LLC, submitted a request to revise the current licensing basis to implement the alternate source term (AST) through reanalysis of the radiological consequences of the Final Safety Analysis Report Chapter 14 accidents.

The NRC staff is reviewing your submittal and has determined that additional information is required to complete the review. The specific information requested is addressed in the enclosure to this letter. During a discussion with your staff on June 23, 2009, it was agreed that you would provide the additional information within 30 days of the date of this letter.

The NRC staff considers that timely responses to requests for additional information help ensure sufficient time is available for staff review and contribute toward the NRC's goal of efficient and effective use of staff resources. If circumstances result in the need to revise the requested response date, please contact me at (301) 415-2048.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Poole", written over a white background.

Justin C. Poole, Project Manager  
Plant Licensing Branch III-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-266 and 50-301

Enclosure:  
Request for Additional Information

cc w/encl: Distribution via ListServ

## REQUEST FOR ADDITIONAL INFORMATION

### POINT BEACH NUCLEAR POWER PLANT (PBNP), UNITS 1 AND 2

#### DOCKET NOS. 50-266 AND 50-301

#### SCVB#1

The license amendment request (LAR) proposes to modify the control room emergency filtration system (CREFS) to create a new alignment for the accident mode that provides a combination of filtered outside air and filtered recirculation air. In addition, it is proposed that the CREFS fans will be automatically loaded onto their associated diesel generator during a loss of offsite power coincident with a Loss of Coolant Accident (LOCA).

- 1a. In the proposed change to Surveillance Requirement (SR) 3.7.9.6, the capability of the CREFS fan to maintain a positive pressure of  $\geq 0.125$  inches water gauge in the control room envelope (CRE) during emergency mode is verified at a flow rate of 4950 cubic feet per minute (cfm)  $\pm 10$  percent. The proposed amendment requires a combination of filtered and re-circulated air with a minimum requirement of 1955 cfm re-circulated. Please explain the significance of the 1955 cfm to the alternate source term (AST) amendment and why it is not necessary to verify this air quantity by the SR (i.e. in addition to verifying the total flow rate).
- 1b. The LAR proposes to revise the licensee's commitment from "to provide technical specification changes to reference an acceptable surveillance methodology (and plans for any associated plant modifications to the CRE) to support requested information in Generic Letter 2003-01, Item (c), for PBNP no later than 180 days following Nuclear Regulatory Commission (NRC) approval of technical specification task force (TSTF)-448," to "FPL Energy Point Beach will submit a LAR addressing CR habitability surveillance methodology in accordance with TSTF-448, as modified by TSTF-508, within 60 days of approval of the AST LAR." The NRC staff has not completed its review of proposed TSTF-508, and a schedule for completion has not been established. The staff requests that the LAR for the control room surveillance methodology be separated into two parts, one that proposes adoption of approved TSTF-448 and, if desired, a second LAR to be submitted after TSTF-508 has been approved. This will prevent delaying review of your request to adopt TSTF-448 TS changes.

#### SCVB#2

The proposed change credits the non-safety related Control Room Ventilation System (VNCR) and also the non-safety related Primary Auxiliary Building Ventilation (VNPAB) System in the dose analysis. This means that non-safety related structures, systems and components will be used to perform a safety-related function. The LAR further states that VNCR has already been upgraded to augmented quality status in the current licensing basis and that VNPAB will be upgraded to augmented quality as part of the effort to adopt AST. These statements imply that at PBNP, non-safety related components with an augmented quality status are allowed to perform and taken credit for a safety-related function.

- 2a. Please provide a detailed explanation of what augmented quality means and how this status is achieved and maintained at PBNP.
- 2b. Temporarily withdrawn.
- 2c. The LAR states that VNPAB will be manually started during post-accident conditions. Can the system be started from the control room (CR), if not, what actions are required external to the CR?

### SCVB#3

In your letter dated February 20, 2009, you stated that the CREFS, which is a portion VNCR that supports the radiological habitability of the CR is currently in PBNP technical specification (TS), and that it is also within the scope of the Maintenance Rule (10 CFR 50.65) and License Renewal (10 CFR 54.37(b)). The letter also stated that VNPAB will be added to the TS, Maintenance Rule, and the License Renewal Program. By letter dated April 17, 2009, you submitted proposed TS for VNPAB. The staff notes that the proposed TS for VNPAB did not include verification of flow quantity. Did the AST dose analysis take credit for this system to operate at a minimum air flow quantity, if so, why is verification of the flow rate not included in the TS?

### SCVB#4

The LAR proposes to revise TS Section 5.5.15, "Containment Leakage Rate Testing Program," item c, to change the maximum allowable containment leakage rate,  $L_a$  at  $P_a$  from 0.4 percent to 0.2 percent of containment air weight per day. Please provide the leakage margins available at PBNP.

- 4a. When was the most recent integrated leak rate test performed? Based on the margins available in this test, can the proposed change be achieved without any modifications, if not, what modifications are planned in order to achieve the results in the proposed TS change?
- 4b. Please summarize the results of your most recent integrated leak rate test and the two most recent local leak rate tests.
- 4c. When is the next integrated leak rate scheduled?

### SCVB#5

The LAR proposes to direct continued containment spray (CS) while on sump recirculation, if radiological conditions and/or core damage indicates it is required. In addition, the LAR proposes to modify CS and residual heat removal (RHR) systems to provide throttling capability of CS and RHR during the emergency core cooling system recirculation phase. What effects will these actions have on post-accident containment pressure and temperature, short term or long term? Also confirm that these changes will have no impact in satisfying review guidance in Standard Review Plan (NUREG-0800) Section 6.2.1.1.A, which states that containment pressure should be reduced to less than 50 percent of peak calculated pressure for the design-basis LOCA within 24 hours after the postulated accident.

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Sincerely,  
/RA/

Justin C. Poole, Project Manager  
Plant Licensing Branch III-1  
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